

UNITED STATES DISTRICT COURT  
IN CLERK'S OFFICE  
DISTRICT OF MASSACHUSETTS

2018 DEC 31 PM 1:54

United States of America

v. U.S. DISTRICT COURT  
DISTRICT OF MASS.

No. : 16-cr-10305

Martin S. Gottesfeld  
Defendant, Pro Se

SUPPLEMENTAL MOTION FOR DISQUALIFICATION PURSUANT  
TO 28 U.S.C. §§ 455(a) and 455(b)

Defendant Martin S. Gottesfeld (herein "Defendant"),  
acting pro se while renewing his objection to such, hereby  
files this supplemental motion to disqualify The Honorable  
U.S. District Court Judge Nathaniel M. Gorton from  
presiding over this case pursuant to 28 U.S.C. §§ 455(a),  
455(b)(1), 455(b)(4), 455(b)(5)(iii) as well as The  
Due Process Clause.

The defendant hereby incorporates his proceeding affidavit  
filed pursuant to 28 U.S.C. § 144 and his previous  
motion for disqualification pursuant to 28 U.S.C. §§ 455(a)  
and 455(b), his previous motion for disqualification  
pursuant to 28 U.S.C. § 144, as well as the exhibits  
filed for those motions into this motion by reference.

The defendant also adds to those arguments via  
Exhibit A attached hereto. Highlighted excerpts of the  
2015 annual report of an organization called the "Seafood

Nutrition Partnership."

Its implications are largely self-explanatory. However, the defendant does wish to highlight the following:

1. The "Seafood Nutrition Partnership" or "SNP" seems to be a coordinated effort to benefit financially the seafood industry in the U.S. through marketing its products as healthy, and in particular as heart healthy.
2. It was founded in 2013, either when Justice was at BCH, or at most about 42 days prior.
3. One of its founding members is listed as the/a Chief Professor of Pediatrics at Harvard Medical School.
4. BCH is Harvard Medical School's primary pediatric affiliate. Many if not most of BCH's senior doctors are also professors or associate professors at Harvard Medical School.
5. Another founding board member of SNP is/was the President and CEO of Gordon's. My team and I are unsure as of yet whether, if any, connections are relevant under 28 U.S.C. 3455 or the Due Process Clause that The Honorable Nathaniel M. Gordon may still share with "Gordon's" as opposed to his connections to "Sleek Gordon" (also listed as a partner/donor in SNP's 2015 report), which are far clearer. Since The Honorable Nathaniel M. Gordon denied D.E. 340 without a hearing, it may be difficult or impossible for us to find out and reasonable questions may persist.

6. BWHT is a significant operational partner of SNP, whose cooperation is no doubt a significant reputational and financial boon to SNP's other partners and especially to its commercial members, providing significant credibility to what otherwise would be far easier to label as a for-profit industry trade group. No other hospitals are listed by SNP in its 2015 report as "national partners" nor on the "Thank You to our Donors" page. The hospital is/was running/pledging 4 pilot "Putting Heart Healthy" programs for SNP, which it and "Roxbury Tenants of Harvard" agreed to operate in the same month in which the search warrant was issued for my home.

7. The Honorable Magistrate Judge Murielanne B. Bowler's husband Merc Pfeffer is and was at all relevant times a cardiologist - or heart doctor - at BWHT.

8. A "Mr. & Mrs. Gorton" are listed as individual donors of SNP, however again since The Honorable Judge Nathaniel M. Gorton denied D.E. 340 without a hearing, it is more difficult to know if they are of any meaningful relation to him.

The Defendant respectfully requests the application of the prison mailbox rule to this motion.

Respectfully mailed December 28th, 2018,  
MSG

Martin S. Gottesfeld, Pro Se  
PCCF 8D 7122S, Unit H1 Cell 235  
26 Long Pond Road  
Plymouth, MA 02360

CERTIFICATE OF SERVICE

I, Martin S. Gottesfeld, hereby certify that on December 28th, 2018 the foregoing document will be mailed to Assistant U.S. Attorney David D'Addio and that the following day, December 29th, 2018, a copy of Exhibit A attached hereto will be mailed to him.

MSG

Martin S. Gottesfeld  
Pro Se

Exhibit A



SEAFOOD  
NUTRITION  
PARTNERSHIP

# ANNUAL REPORT 2015

*Inspiring A Healthier America*



Message from Chairman Jack Kilgore

Dear Friends,

What we eat directly affects our health. It is a simple message, and yet there remains a critical need to reinforce it among all segments of our society, through education on how to eat more nutritiously.

This is the underlying mission of Seafood Nutrition Partnership (SNP), founded in 2013 and built on public-private partnerships among broad-based industries and sectors that care about the health and wellness of our fellow citizens. SNP educates Americans about the benefits of a seafood-rich diet as a scientifically proven means of reducing the risk of chronic diseases. In this way, SNP represents one vital piece of the multi-tiered effort to address America's growing health crisis.

I am honored to be part of the founding board of SNP along with:

- Mr. Judson Reis, founding Chair of SNP, President and CEO of Gorton's
- Mr. Detlef Schrempf, President of the Detlef Schrempf Foundation
- Dr. Allan Walker, Professor of Pediatrics, Chief, Harvard Medical School; Conrad Taff Professor of Nutrition, Harvard Medical School; Professor of Nutrition, Harvard School of Public Health

We are today joined by an impressive group of board members, ambassadors and partners, as well as a scientific and nutrition advisory council, all of whom are making a difference and whose impact will only continue to grow as our mission fills an ever-greater need in our society.

In this report, we are pleased to share the significant progress we have made in our outreach efforts. I thank our visionary donors and partners for supporting us from the beginning, and I encourage you to join us in the ongoing journey to inspire a healthier America.

Best Regards,  
Jack Kilgore  
Chair  
Seafood Nutrition Partnership



*SNP educates Americans about the benefits of a seafood-rich diet as a scientifically proven means of reducing the risk of chronic diseases.*



**Jack Kilgore**  
 Chair and Founding Member  
 President, Consumer Brands Division  
 (Retired), Rich Products Corporation  
[www.seafoodnutrition.org/jack-kilgore.html](http://www.seafoodnutrition.org/jack-kilgore.html)

**Henry Demone**  
 Vice Chair and Treasurer  
 Chairman, High Liner Foods, Inc.  
[www.seafoodnutrition.org/henry-demone.html](http://www.seafoodnutrition.org/henry-demone.html)

**Linda Cornish**  
 Executive Director and Secretary  
 Seafood Nutrition Partnership  
[www.seafoodnutrition.org/linda-cornish.html](http://www.seafoodnutrition.org/linda-cornish.html)

**Tom Brenna, PhD**  
 Director  
 Professor, Division of Nutritional Sciences, Cornell University  
[www.seafoodnutrition.org/tom-brenna.html](http://www.seafoodnutrition.org/tom-brenna.html)

**JoAnne Foody, MD, FACC, FAHA**  
 Director  
 Global Director for Scientific Affairs, Merck  
[www.seafoodnutrition.org/joanne-foody.html](http://www.seafoodnutrition.org/joanne-foody.html)

**Judson Reis**  
 Director and Founding Member  
 President and Chief Executive Officer, Gorton's Inc.  
[www.seafoodnutrition.org/judson-reis.html](http://www.seafoodnutrition.org/judson-reis.html)

**Judith Rodriguez, PhD**  
 Director  
 Chairperson and Professor, Department of Nutrition and Dietetics, University of North Florida  
[www.seafoodnutrition.org/judy-rodriguez.html](http://www.seafoodnutrition.org/judy-rodriguez.html)

**Detlef Schrempf**  
 Director and Founding Member  
 President, Detlef Schrempf Foundation  
[www.seafoodnutrition.org/detlef-schrempf.html](http://www.seafoodnutrition.org/detlef-schrempf.html)

**Hugh Welsh**  
 Director  
 President and General Counsel, DSM North America  
[www.seafoodnutrition.org/hugh-welsh.html](http://www.seafoodnutrition.org/hugh-welsh.html)

BW/H  
 Harvard

"Heart Healthy"  
 ↓

## SEPTEMBER 2014

As a Clinton Global Initiative (CGI) Commitment to Action, SNP, Brigham and Women's Hospital, and Roxbury Tenants of Harvard formally pledge to pilot four Eating Heart Healthy programs.

## OCTOBER 2014

SNP launches pilot grassroots education program in Indianapolis, IN and Memphis, TN.

## DECEMBER 2014

Dr. JoAnne Foody joins the Board of Directors.

## 2015

### JULY 2015

An additional \$1.5MM is raised from visionary leaders towards a public health education campaign.

### OCTOBER 2015

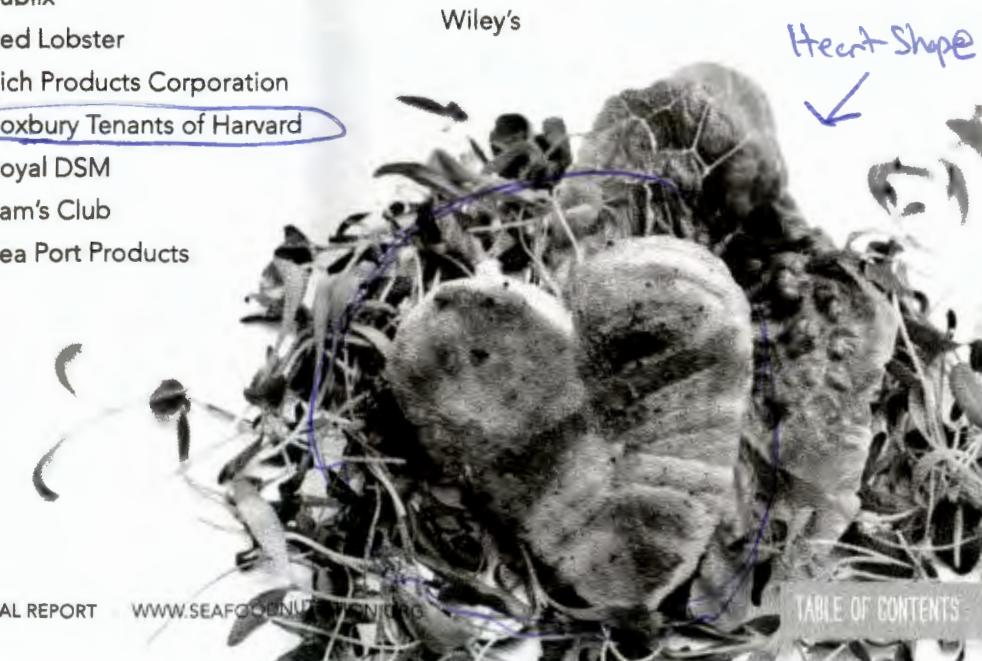
SNP launches national public health education campaign with grassroots education in nine cities: Birmingham, AL; Brunswick, GA; Charleston, WV; Indianapolis, IN; Jacksonville, FL; Lexington, KY; Memphis, TN; Oklahoma City, OK; Toledo, OH.

Eating Heart Healthy program is established in 8 cities: Birmingham, AL; Boston, MA; Charleston, WV; Lexington, KY; Memphis, TN; Oklahoma City, OK; Seattle, WA; Toledo, OH.

### DECEMBER 2015

Mr. Hugh Welsh joins the Board of Directors.

AGR Partners	Global Aquaculture Alliance	Nuts Over Fish	Seabreeze Seafoods
Alaska Bering Sea Crabbers	Global Organization for EPA and DHA (GOED)	Ocean Beauty Seafoods	Seafood Exchange of Florida
Alaska Seafood Marketing Institute (ASMI)	Global Seas	Odyssey Enterprises	SeaShare
American Cancer Society	Gorton's	OmegaQuant	Seattle Fish Company
American Seafoods	Handy	Orca Bay Seafoods	SIRE
Associated Wholesale Grocers (AWG)	Harbor Seafood	Pacific Andes	Slade Gorton
Beacon Fisheries	Harvest Select	Phillips Lytle	Soy Aquaculture Alliance
Brigham and Women's Hospital	Healthy Weight Commitment Foundation	PNW (Project for Nutrition & Wellness)	SPE Certified
Bumble Bee Seafoods	High Liner Foods	PNW Seafood 101 (NOAA Fisheries PNW)	Stavis Seafoods
Captain D's	Hyatt Regency Boston	Preferred Freezer Services	Tampa Maid Foods
Censea	Icicle Seafoods	President's Challenge	Together Counts
Chicken of the Sea	Indiana Soybean Alliance	ProFish	Trident Seafoods
Clear Springs Foods	Ipswich Shellfish Company	Provant	Tsunami
Colavita	King & Prince Seafood	Publix	UniSea
Darden	Long John Silver's	Red Lobster	USDA ChooseMyPlate.gov
Diversified Communications	Marine Harvest	Rich Products Corporation	Wiley's
DSM	Marine Stewardship Council (MSC)	Roxbury Tenants of Harvard	
Eastern Fish Company	Mazzetta Company	Royal DSM	
F.W. Bryce	Morey's	Sam's Club	
FoodDay	National Fisheries Institute	Sea Port Products	
Fortune Fish & Gourmet	National Institutes of Health - The HeartTruth		
Genuine Alaska Pollock Product (GAPP)	NOAA FishWatch		
Glacier Fish Company	NutriSavings		



## Thank You to Our Donors

### CHAIRMAN'S CAMPAIGN CIRCLE

#### Visionary Partners \$500,000+

DSM  
**Gorton's**  
 High Liner Foods  
 Mazzetta Company, LLC  
 Trident Seafoods

#### Anchor Partners \$250,000 to \$499,999

American Seafoods Group  
 Bumble Bee  
 National Fisheries Institute

#### Tailwind Partners \$100,000 to \$249,999

CenSea  
 Eastern Fish Company  
 Fortune Fish & Gourmet  
 Glacier Fish Company  
 Harbor Seafood  
 King & Prince Seafood  
 Long John Silver's  
 Marine Harvest  
 Rich Products

#### Eating Heart Healthy Donors & Partners

54 North  
 American Heart Association  
 Massachusetts  
 Boston Scientific  
**Brigham and Women's Hospital**  
 Colavita  
 Hyatt Regency Boston  
 McCormick Spices  
 OmegaQuant  
 Roxbury Tenants of Harvard  
 Stavis Seafoods  
 Vela Foundation  
 Wiley's Finest

#### Annual Donors – Change Leader

\$25,000+  
 Morey's  
 Odyssey Enterprises, Inc.

#### Annual Donors – Mobilizers

\$10,000+  
 Clear Springs Foods  
 Handy  
 Harvest Select  
 Icicle Seafoods  
 Indiana Soybean Alliance  
 Ocean Beauty Seafoods  
 Sire Foundation  
**Slade Gorton**  
 Soy Aquaculture Alliance  
 Stavis Seafoods  
 Tampa Maid  
 UniSea

#### Annual Donors – Supporters

\$1,000+  
 Alaska Bering Sea Crabbers  
 Beacon Fisheries  
 F.W. Bryce, Inc.  
 Global Seas  
 Nuts Over Fish  
 Phillips Lytle LLP  
 Seabreeze Seafoods  
 Seattle Fish

#### In-Kind Supporters

54 North  
 American Cancer Society  
 Colavita  
 Diversified Communications  
 Hyatt Regency Boston  
 McCormick Spices  
 OmegaQuant  
 Tsunami  
 Wiley's Finest

#### Individual Support

Dr. & Mrs. Brenna  
 Mr. & Mrs. Cornish  
 Mr. Enlow  
 Mr. Figueiroa  
**Mr & Mrs. Gorton**  
 Mr. Hart  
 Mr. Kaelin  
 Mr. & Mrs. Kilgore  
 Mr. Larkin  
 Mr. & Mrs. Nichols  
 Dr. Otterstrom  
 Mr. & Mrs. Reis  
 Mr. & Mrs. Rodriguez  
 Mr. Schramm  
 Mr. & Mrs. Schrempf  
 Ms. Scott  
 Mr. Simmons  
 Ms. Vaugh

